| 1  | ISMAIL J. RAMSEY (CABN 189820)   |  |  |
|----|--|--|--|
| 2  | United States Attorney MICHELLE LO (NYRN 4325163)  |  |  |
| 3  | Chief, Civil Division ELIZABETH KURLAN (CABN 255869)   |  |  |
| 4  | Assistant United States Attorney   |  |  |
|    | 450 Golden Gate Avenue, Box 36055<br>San Francisco, California 94102-3495                            |  |  |
| 5  | Telephone: (415) 436-7298  |  |  |
| 6  | Facsimile: (415) 436-6748<br>Elizabeth.Kurlan@usdoj.gov  |  |  |
| 7  | Attorneys for Defendants   |  |  |
| 8  | UNITED STATES DISTRICT COURT   |  |  |
| 9  | NORTHERN DISTRICT OF CALIFORNIA  |  |  |
| 0  | SAN FRANCISCO DIVISION   |  |  |
| 1  |  |  |  |
| 2  | ROBERTO EDUARDO HERNANDEZ LEON,  | G 2 22 04001 LIG   |  |
| 3  | Plaintiff,   | C 3:23-cv-04901 LJC  |  |
| 14 | v.   | SECOND STIPULATION TO EXTEND TIME                                    |  |
| 5  | MERRICK GARLAND, Attorney General of   | WITHIN WHICH DEFENDANTS MUST FILE A<br>RESPONSE AND [PROPOSED] ORDER |  |
| 16 | the United States, et al.,   |  |  |
| 17 | Defendants.  |  |  |
| 18 |  |  |  |
| 9  | The parties, through their undersigned att   | orneys, hereby stipulate to an extension of time within              |  |
| 20 |  | • •  |  |
|    | which the Defendants must serve the answer or otherwise respond in the above-entitled action.        |  |  |
| 21 | Defendants will file their response on or before January 11, 2024. Defendants need a brief period of |  |  |
| 22 | additional time to prepare their response.   |  |  |
| 23 | On November 27, 2023, the Court granted Defendant's request for an extension of time to file         |  |  |
| 24 | their response to Plaintiff's complaint. In accorda  | ance with Civil Local Rule 5-1(i)(3), the filer of this              |  |
| 25 | document attests that all signatories listed herein concur in the filing of this document.           |  |  |
| 26 | //   |  |  |
| 27 | //   |  |  |
| 28 |  |  |  |
|    | Stip to Extend<br>C 3:23-cv-04901 LJC  |  |  |

## Case 3:23-cv-04901-LJC Document 16 Filed 12/27/23 Page 2 of 3

| 1  | Dated: December 27, 2023                  | Respectfully submitted,                                   |
|----|---|---|
| 2  |   | ISMAIL J. RAMSEY  |
| 3  |   | United States Attorney                                    |
| 4  |   | <u>s/ Elizabeth D. Kurlan</u><br>ELIZABETH D. KURLAN      |
| 5  |   | Assistant United States Attorney Attorneys for Defendants |
| 6  |   | Actionicy's for Defendants                                |
| 7  | Dated: December 27, 2023                  | s/ Iosh F Sigal   |
| 8  |   | s/ Josh F. Sigal JOSH F. SIGAL Sigal Law Offices          |
| 9  |   | Attorney for Plaintiff                                    |
| 10 |   |   |
| 11 | [PROPOSED] ORDER                          |   |
| 12 | Pursuant to stipulation, IT IS SO ORDERED |   |
| 13 |   |   |
| 14 | Date: December 27, 2023                   | Jun sirus   |
| 15 |   | HON. LISA J CISNEROS<br>United States Magistrate Judge    |
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| 27 |   |   |
| 28 | Stip to Extend<br>C 3:23-cv-04901 LJC 2   |   |

DECLARATION OF ELIZABETH D. KURLAN 1 2 I, Elizabeth D. Kurlan, declare and state as follows: I am an Assistant United States Attorney in the United States Attorney's Office for the 3 1. Northern District of California and counsel of record for the federal Defendants in the above-captioned 4 5 action. 2. 6 On November 27, 2023, the Court granted Defendant's request for an extension of time 7 to file their response to Plaintiff's complaint. See Dkt. No. 14. 8 3. On December 21, 2023, I contacted Plaintiff regarding Defendants' second request for an 9 extension of time to prepare their response to the complaint, and Plaintiff consented to the request. 10 I declare under penalty of perjury under the laws of the United States of America that the 11 foregoing is true and correct. 12 13 DATED: December 27, 2023 14 ELIZABETH D. KURLAN Assistant United States Attorney 15 16 17 18 19 20 21 22 23 24 25 26 27 28

Stip to Extend C 3:23-cv-04901 LJC